



West Lake Update

June 1, 2022

West Lake Landfill Dashboard; Operable Unit 1 Remedial Design Update; Field Oversight, Health and Safety; Superfund Enforcement Process

West Lake Landfill Dashboard

On April 22, 2022, EPA unveiled the new [West Lake Landfill Dashboard](#). EPA designed this webpage to provide timely transparency into the Superfund and Remedial Design process for the West Lake Landfill Superfund Site, ensuring that community members, elected officials, and stakeholders can follow site progress on a simple, easy to use, and intuitive display.

On the same day EPA unveiled the Dashboard, EPA Region 7 Administrator Meg McCollister met with local elected officials, representatives from congressional offices, community leaders, and stakeholders to discuss site progress. The day also included an EPA-coordinated tour of the landfill, which was conducted by Republic Services.

EPA will continue to update the Dashboard as the Agency receives new information from the Remedial Design Investigation. EPA will also update the Dashboard to incorporate information from other areas of interest,

including Operable Unit 3, which comprises groundwater at the site.

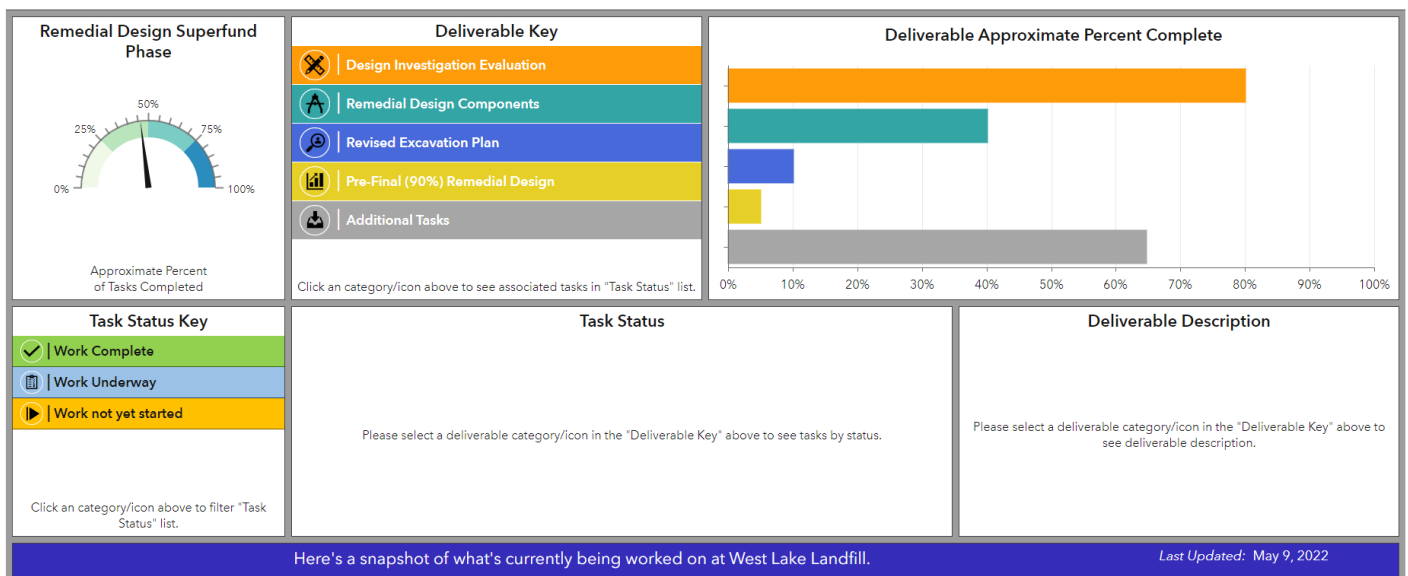
EPA welcomes your feedback on the Dashboard. If you have suggestions for improvement, please contact Ben Washburn at washburn.ben@epa.gov.

Operable Unit 1 Remedial Design Update

Based on field and laboratory data collected under previous Field Sampling Plan (FSP) addenda, additional sampling is required to finalize the extent of radiologically impacted material (RIM) and complete the Operable Unit 1 (OU-1) Design Investigation. On April 15, 2022, the OU-1 Respondents submitted FSP Addendum 6 to EPA, which proposed additional step-out boring locations to identify the extent of RIM; additional borings and sampling to characterize the waste for off-site disposal; and additional borings to support the design of the optimized excavation. The Respondents also submitted Addendum 7, which proposes an evaluation of sediment depth and additional sediment sampling locations.

On May 6, 2022, EPA provided an approval with modifications on Addendum 6, and disapproved Addendum 7. A revised version of Addendum 6 was submitted on May 13, 2022, which incorporates the required modifications pro-

EPA West Lake Landfill Operable Unit 1 Bridgeton, Missouri



The West Lake Landfill Dashboard includes information related to major components of the Operable Unit 1 Remedial Design phase and provides the status for dozens of individual parts of the Remedial Design phase.

vided by EPA. Revised Addendum 7 will be submitted for EPA's review no later than June 5, 2022. Detailed figures showing these additional sampling locations are included in the first version of each addenda, which are available on the [West Lake Landfill Site Profile Page](#) along with EPA's comment letter. Final approved versions of the documents will also be added to the Site Profile Page. The interactive map on the [West Lake Landfill Dashboard](#) has been updated to include the Addendum 6 sampling locations. Sediment sampling locations under Addendum 7 will be added once they are approved by EPA. The progress dashboard on the webpage has also been updated to include the Addendum 6 and Addendum 7 tasks.

Partial approval of the proposed step-out boring locations under Addendum 6 was provided while the document was under review to avoid a delay in field work commencing. Field activities for Addendum 6 began on May 2, 2022, and this work is anticipated to continue into June 2022. Review of the sampling results will determine whether additional borings are necessary.

Completion of the Design Investigation field work is a very important element of the OU-1 Remedial Design, particularly for completion of the Revised Excavation Plan. In 2020, EPA provided approval of the Respondents' initial OU-1 Design Investigation, which then took approximately three months to complete. Additional areas of RIM were identified, primarily in the Inactive Sanitary Landfill and the Construction and Demolition Landfill. The Respondents then conducted additional sampling and the duration of field work increased significantly. Meanwhile, work has progressed on other critical design tasks, including design of the cover system, excavation and loading procedures, disposal facility evaluations, and plans for monitoring to be conducted during the Remedial Action. Progress of these various work tasks is illustrated on the online progress dashboard, which is updated frequently to remain current.

Completion of a detailed and technically sound Remedial Design will help prevent future delays during the excavation of RIM and construction of the final cover system, and will also minimize the time that excavation areas will remain open, which in turn decreases the time that RIM and landfill waste will be exposed.

Field Oversight, Health and Safety

During the Design Investigation, EPA has routinely been on-site overseeing the field activities to ensure that they are performed in accordance with the approved Work Plans, and so that any necessary modifications due to field conditions can be rapidly approved by EPA to avoid delays. EPA oversight includes ensuring that actions intend-

ed to minimize the creation of dust during work are being followed, and that air monitoring at the site is ongoing and will continue throughout OU-1 field investigations. The Missouri Department of Natural Resources is assisting EPA with overseeing field activities.

Superfund Enforcement Process

Pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA, commonly known as the "Superfund" law), the Superfund Enforcement program achieves remedial site cleanup by identifying and engaging the parties responsible for the contamination and negotiating a consent decree with them for the performance of the required work. The consent decree is subject to public comment and federal court approval.

If the parties decline to engage in good faith negotiations with EPA and the U.S. Department of Justice, EPA may unilaterally issue an order to the parties for the performance of the work. Such an order contains penalties for noncompliance and may be enforced by the U.S. in federal court.

In addition to the consent decree and unilateral order options referenced above, EPA may conduct the required work using available CERCLA funds and bring an action in federal court against the liable parties for reimbursement of the government's costs, along with statutory penalties and damages.

While it is generally the government's preference to obtain the performance of work by the responsible parties at Superfund sites through a consensual process, there are enforcement and "fund-lead" options available to move the required work forward. Consideration and decision-making on the preferred path is typically based on site-specific considerations and involves the appropriate EPA Regional Office, EPA Headquarters, Department of Justice, and the affected state. Learn more about [Superfund Enforcement](#).

Community Inquiries

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